UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- V. -

: PRELIMINARY ORDER OF

FORFEITURE

:

ABDULAI JALLOH, 23 Cr. 592 (JGLC)

:

Defendant.

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WHEREAS, on or about November 14, 2023, ABDULAI JALLOH (the "Defendant"), was charged in a one-count Sealed Indictment, 23 Cr. 592 (JGLC) (the "Indictment"), with trafficking in counterfeit goods, in violation of Title 18, United States Code, Sections 2330(a)(1) and 2 (Count One);

WHEREAS, the Indictment included a forfeiture allegation as to Count One of the Indictment, seeking forfeiture to the United States, pursuant to Title 18, United States Code, Section 2323(b), of any and all articles made or trafficked as part of the commission of the offense charged in Count One of the Indictment, and any and all property constituting or derived from any proceeds obtained directly or indirectly as a result of the commission of the offense charged in Count One of the Indictment, and any and all property used, or intended to be used, in any manner or part to commit or facilitate the commission of the offense charged in Count One of the Indictment, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of the offense charged in Count One of the Indictment that the Defendant personally obtained;

WHEREAS, on or about January 2, 2025, the Defendant pled guilty to Count One of the Indictment, and

WHEREAS, the Government contends that the following property constitutes counterfeit property used in the offense and/or used to facilitate the commission offense charged in Count One of the Indictment:

- a. Any and all counterfeit designer luxury items seized by the Government on or about October 20, 2023 through October 30, 2023 from storage unit #41220 at Gotham Mini Storage located at 501 Tenth Avenue, New York, New York;
- b. Any and all counterfeit designer luxury items seized by the Government on or about October 20, 2023 through October 30, 2023 from storage unit #41395 at Gotham Mini Storage located at 501 Tenth Avenue, New York, New York;
- c. Any and all counterfeit designer luxury items seized by the Government on or about October 20, 2023 through October 30, 2023 from storage unit #51006 at Gotham Mini Storage located at 501 Tenth Avenue, New York, New York;
- d. Any and all counterfeit designer luxury items seized by the Government on or about October 20, 2023 through October 30, 2023 from storage unit #51118 at Gotham Mini Storage located at 501 Tenth Avenue, New York, New York;
- e. Any and all counterfeit designer luxury items seized by the Government on or about October 20, 2023 through October 30, 2023 from storage unit #51206 at Gotham Mini Storage located at 501 Tenth Avenue, New York, New York;
- f. Any and all counterfeit designer luxury items seized by the Government on or about October 20, 2023 through October 30, 2023 from a room on the sixth floor of 545 8th Avenue, New York, New York;
- (a. through r., collectively, the "Specific Property");

WHEREAS, pursuant to Title 21, United States Code, Section 8553(g), and Rules 32.2(b)(3), and 32.2(b)(6) of the Federal Rules of Criminal Procedure, the Government is now entitled, pending any assertion of third-party claims, to reduce the Specific Property to its possession and to notify any and all persons who reasonably appear to be a potential claimant of their interest herein;

IT IS HEREBY ORDERED that:

- 1. As a result of the offense charged in Count One of the Indictment, to which the Defendant was found guilty, any right, title and interest Defendant may have in the Specific Property is hereby forfeited to the United States for disposition in accordance with the law, subject to the provisions of Title 21, United States Code, Section 853.
- 2. Pursuant to Rule 32.2(b)(4) of the Federal Rules of Criminal Procedure, this Preliminary Order of Forfeiture as to Specific Property is final as to the Defendant ABDULAI JALLOH, and shall be deemed part of the sentence of the Defendant, and shall be included in the judgment of conviction therewith.
- 3. Upon entry of this Preliminary Order of Forfeiture as to Specific Property, the United States Customs and Border Protection, or its designee the Office of Fines, Penalties, and Forfeiture, is hereby authorized to take possession of the Specific Property and to hold such property in its secure custody and control.
- 4. Pursuant to Title 21, United States Code, Section 853(n)(1), Rule 32.2(b)(6) of the Federal Rules of Criminal Procedure, and Rules G(4)(a)(iv)(C) and G(5)(a)(ii) of the Supplemental Rules of Certain Admiralty and Maritime Claims and Asset Forfeiture Actions, the United States is permitted to publish forfeiture notices on the government internet site, www.forfeiture.gov. This site incorporates the forfeiture notices that have been traditionally

published in newspapers. The United States forthwith shall publish the internet ad for at least thirty (30) consecutive days. Any person, other than the Defendant, claiming interest in the Specific Property must file a Petition within sixty (60) days from the first day of publication of the Notice on this official government internet website, or no later than thirty-five (35) days from the mailing of actual notice, whichever is earlier.

- 5. The published notice of forfeiture shall state that the petition (i) shall be for a hearing to adjudicate the validity of the petitioner's alleged interest in the Specific Property, (ii) shall be signed by the petitioner under penalty of perjury, and (iii) shall set forth the nature and extent of the petitioner's right, title or interest in the Specific Property, the time and circumstances of the petitioner's acquisition of the right, title and interest in the Specific Property, any additional facts supporting the petitioner's claim, and the relief sought, pursuant to Title 21, United States Code, Section 853(n).
- 6. Pursuant to Rule 32.2(b)(6)(A) of the Federal Rules of Criminal Procedure, the Government shall send notice to any person who reasonably appears to be a potential claimant with standing to contest the forfeiture in the ancillary proceeding.
- 7. Upon adjudication of all third-party interests, this Court will enter a Final Order of Forfeiture with respect to the Specific Property pursuant to Title 21, United States Code, Sections 853(n), in which all interests will be addressed.
- 8. Pursuant to Rule 32.2(b)(3) of the Federal Rules of Criminal Procedure, the United States Attorney's Office is authorized to conduct any discovery needed to identify, locate or dispose of forfeitable property, including depositions, interrogatories, requests for production of documents and the issuance of subpoenas.

9. The Court shall retain jurisdiction to enforce this Preliminary Order of Forfeiture as to Specific Property, and to amend it as necessary, pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure.

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10. The signature page of this Preliminary Order of Forfeiture as to Specific Property may be executed in one or more counterparts, each of which will be deemed an original but all of which together will constitute one and the same instrument.

SO ORDERED:

July 1, 2025 DATE

HONORABLE JESSICA G.L. CLARKE UNITED STATES DISTRICT JUDGE